

**REDACTED**

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

Criminal Action No. 05- 51

MICHAEL J. ANDERSON, :

Defendant. :

**INDICTMENT**

The Grand Jury for the District of Delaware charges that:

**COUNT ONE**

On or about January 20, 2005, in or near Claymont, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, did unlawfully obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully take and obtain personal property consisting of cash in the custody and possession of the victim, a person working at Cumberland Farms, 1310 Philadelphia Pike, Claymont, Delaware, against his will by means of threatened force, violence, and fear of injury, immediate and future, to his person, in violation of Title 18, United States Code, Section 1951.

**COUNT TWO**

On or about January 21, 2005, in or near Claymont, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, did unlawfully obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, by robbery, in that

the defendant did unlawfully take and obtain personal property consisting of cash in the custody and possession of the victim, a person working at Seven Eleven, 2409 Philadelphia Pike, Claymont, Delaware, against his will by means of threatened force, violence, and fear of injury, immediate and future, to his person, in violation of Title 18, United States Code, Section 1951.

**COUNT THREE**

On or about January 23, 2005, in or near Claymont, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, did unlawfully obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully take and obtain personal property consisting of cash in the custody and possession of the victim, a person working at Cumberland Farms, 1310 Philadelphia Pike, Claymont, Delaware, against her will by means of threatened force, violence, and fear of injury, immediate and future, to her person, in violation of Title 18, United States Code, Section 1951.

**COUNT FOUR**

On or about January 24, 2005, in or near Wilmington, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, did unlawfully attempt to obstruct, delay and affect commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendant did unlawfully attempt to take and obtain personal property consisting of cash in the custody and possession of the victim, a person working at Arby's, 4004 Concord Pike, Wilmington, Delaware, against his will by means of threatened force, violence, and fear of injury, immediate and future, to his person, in violation of Title 18, United States Code, Section 1951.

**COUNT FIVE**

On or about January 26, 2005, in or near Wilmington, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, by intimidation, did take from the person and presence of a bank employee a sum of money belonging to and in the care, custody, control, management, and possession of Citizens Bank, 2084 Namaans Road, Wilmington, Delaware, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

**COUNT SIX**

On or about January 28, 2005, in or near Wilmington, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, by intimidation, did take from the person and presence of a bank employee a sum of money belonging to and in the care, custody, control, management, and possession of Commerce Bank, 4010 Concord Pike, Wilmington, Delaware, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

**COUNT SEVEN**

On or about February 4, 2005, in or near Newark, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, by intimidation, did take from the person and presence of a bank employee a sum of money belonging to and in the care, custody, control, management, and possession of Citizens Bank, 1 University Plaza, Newark, Delaware, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

**COUNT EIGHT**

On or about February 5, 2005, in or near Wilmington, in the State and District of Delaware, MICHAEL J. ANDERSON, defendant herein, by intimidation, did take from the person and presence of a bank employee a sum of money belonging to and in the care, custody, control, management, and possession of Citizens Bank, 100 Suburban Drive, Newark, Delaware, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL:

\_\_\_\_\_  
Foreperson

COLM F. CONNOLLY  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

Anne Y. Park  
Assistant United States Attorney

Dated: May 24, 2005